**USDC SDNY** DOCUMENT

DATE FILED:

DOC #:

Verrill Dana...

Attorneys at Law

HED TO COUNSEL

ELECTRONICALLY FILED

Via fax: 212-805-7941 une 25

Honorable Loretta A. Preska United States District Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street Room 1320 New York NY 10007

Rei

United States v. Angela Hamblin

07-cr-1191 (LAP)

Dear Judge Preska:

I write to request that Angela Hamblin be excused from appearing at the Status Conference scheduled before Your Honor on July 2, 2008 at 9:30am. As you recall, Mrs. Hamblin was excused by this Court from appearing at the pre-trial conference on February 26, 2008.

It is my understanding that the primary purpose of the status conference is procedural, i.e. to determine the status of discovery and to set a date for trial. I have advised Mrs. Hamblin of the Speedy Trial ramifications of these issues and she agrees to waive the time set for completion of discovery and for trial preparation in the interest of justice, pursuant to 18 U.S.C. § 3161(h)(8)(A).

Ms. Hamblin resides with her husband in Revere, Massachusetts and would incur substantial expense to appear at the conference. In light of the foregoing, and the fact that the hearing will be non-testimonial, I respectfully request that Mrs. Hamblin be excused from attending the Status Conference on July 2, 2008. The Government does not object to this application.

UNITED STATES DISTRICT JUDGE

une 29,2008

Portland, Augusta, Kennebunk, Maine • Boston • Hertford • Kansas City • Washington, D.C.

Honorable Loretta A. Preska February 20, 2008 Page 2

Should you have any questions regarding this application or require any additional information, I can be reached at (207) 871-7770.

Respectfully submitted,

Richard S. Berne Attorney for Defendant Angela Hamblin

cc: Seetha Ramachandran, AUSA (via fax) Angela Hamblin